

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

CR09-00982

PJH

UNITED STATES OF AMERICA,

v.

E-filing

FILED

OCT - 8 2009

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

RANNI K. HILLYER,

DEFENDANT(S).

INDICTMENT

26 U.S.C. § 7201 - Tax Evasion (3 counts)

A true bill.

Walt Bodley

Foreman

Filed in open court this _____ day of _____

Clerk

~~By~~

Colleen Simmons

[Signature]

10/8/09

JOSEPH RUSSONIELLO (CSBN 44332)
United States Attorney

E-filing

FILED

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PJH

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANNI K. HILLYER,

Defendant.

CR09-00982

VIOLATIONS: 26 U.S.C. § 7201-
Tax Evasion (Three Counts)

OAKLAND VENUE

I N D I C T M E N T

The Grand Jury charges:

COUNT ONE: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax for 2002 tax year)

On or about the 17th day of October, 2003, in the Northern District of California,
RANNI K. HILLYER, then a resident of Pleasanton, California, who during the calendar 2002,
was married, did willfully attempt to evade and defeat a large part of the income tax due and
owing by her and her spouse to the United States of America for the calendar year 2002, by
preparing and causing to be prepared, and by signing and causing to be signed, a false and
fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her
spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their
joint taxable income for the calendar year 2002 was the sum of \$116,085 and that the amount of
tax due and owing thereon was the sum of \$37,607. In fact, as she then and there knew, their

1 taxable income for the calendar year was substantially in excess of the amount stated on the
2 return, and, upon the additional taxable income, additional tax was due and owing to the United
3 States of America.

4 In violation of Title 26, United States Code, Section 7201.

5 COUNT TWO: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax for 2003 tax year)

6 On or about the 22nd day of September, 2004, in the Northern District of California,
7 RANNI K. HILLYER, then a resident of Pleasanton, California, who during the calendar 2003,
8 was married, did willfully attempt to evade and defeat a large part of the income tax due and
9 owing by her and her spouse to the United States of America for the calendar year 2003, by
10 preparing and causing to be prepared, and by signing and causing to be signed, a false and
11 fraudulent joint U.S. Individual Income Tax Return, Form 1040, on behalf of herself and her
12 spouse, which was filed with the Internal Revenue Service. In that return, it was stated that their
13 joint taxable income for the calendar year 2003 was the sum of \$166,466 and that the amount of
14 tax due and owing thereon was the sum of \$39,641. In fact, as she then and there knew, their
15 taxable income for the calendar year was substantially in excess of the amount stated on the
16 return, and, upon the additional taxable income, additional tax was due and owing to the United
17 States of America.

18 In violation of Title 26, United States Code, Section 7201.

19 COUNT THREE: (26 U.S.C. § 7201- Attempt to Evade or Defeat Tax for 2004 tax year)

20 On or about the 17th day of October, 2005, in the Northern District of
21 California, RANNI K. HILLYER, then a resident of Pleasanton, California, who during the
22 calendar 2004, was married, did willfully attempt to evade and defeat a large part of the income
23 tax due and owing by her to the United States of America for the calendar year 2004, by
24 preparing and causing to be prepared, and by signing and causing to be signed, a false and
25 fraudulent U.S. Individual Income Tax Return, Form 1040, as married filing separately, which
26 was filed with the Internal Revenue Service. In that return, it was stated that her taxable income
27 for the calendar year 2004 was the sum of \$58,635 and that the amount of tax due and owing
28 thereon was the sum of \$12,628. In fact, as she then and there knew, her taxable income for the

1 calendar year was substantially in excess of the amount stated on the return, and, upon the
2 additional taxable income, additional tax was due and owing to the United States of America.

3 In violation of Title 26, United States Code, Section 7201.

4
5 A TRUE BILL.

6 Dated: October 8, 2009

Walter Bodley
FOREPERSON

7 JOSEPH P. RUSSONIELLO
8 United States Attorney

9 Brian Stretch
10 BRIAN STRETCH
11 Chief, Criminal Division

12
13 (Approved as to form: Cynthia Stier)
14 AUSA STIER